

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of Revision of the)
Commission's Rules to Ensure) CC Docket No. 94-102
Compatibility with Enhanced 911)
Emergency Calling Systems)

U S WEST, INC. COMMENTS ON EX PARTE FILING

U S WEST, Inc. ("U S WEST") hereby provides these comments in response to the Federal Communications Commission's ("Commission" or "FCC") Public Notice dated October 3, 1997, whereby additional comments were sought in the wireless enhanced 911 reconsideration proceeding regarding the rules and schedules.¹

I. **SUPPORT OF EX PARTE LETTER**

U S WEST files these Comments in support of the September 25, 1997, ex parte letter submitted by the Cellular Telecommunications Industry Association ("CTIA"), the Personal Communications Industry Association ("PCIA"), the Association of Public-Safety Communications Officials-International, Inc. ("APCO"),

¹ **Public Notice, Additional Comment Sought In Wireless Enhanced 911 Reconsideration Proceeding Regarding Rules and Schedules**, CC Docket No. 94-102, DA 97-2751, rel. Oct. 3, 1997 ("Public Notice").

the National Emergency Number Association ("NENA"), and the National Association of State Nine-One-One Administrators ("NASNA").²

U S WEST also supports the proposed extension of time concerning Text Telephone ("TTY")/Telecommunications Device for the Deaf ("TDD") issues.³

II. EXTENSION OF TIME

The Commission established an October 1, 1997, deadline for implementation of 911 services over digital wireless systems for TTY/TDD users.⁴ The Commission stated that "carriers must transmit TTY calls to 911 services."⁵ The Commission stated further that the industry should coordinate efforts to "establish standards that will permit interfaces between TTYs and wireless systems."⁶

² Ex parte letter from Michael F. Altschul, CTIA, Mary E. Madigan, PCIA, Robert Gurss, APCO, Jim Hobson, NENA, and NASNA, to Reed E. Hundt, FCC, dated Sep. 25, 1997 ("Ex Parte Letter"); Public Notice at 1.

³ Ex Parte Letter at 4.

⁴ In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd. 18676 (1996) ("E911 Report and Order"), 18682-83 ¶ 10, 18701 ¶ 50, 18767-68 Appendix C, 18769-71 Appendix D, Tables A and B. The rule amendments specified in Appendix C became effective 60 days after publication in the Federal Register (id. at 18751 ¶ 160). Those rule amendments were published at 61 Fed. Reg. 40348 on August 2, 1996, making the effective date October 1, 1996. The Wireless Bureau recently extended that deadline to November 30, 1997 (In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, DA 97-2119, rel. Sep. 30, 1997).

⁵ E911 Report and Order at 18701 ¶ 50.

⁶ Id. at 18701-02 ¶ 51.

The September 25, 1997, Ex Parte Letter proposes to extend the compliance date for implementation of 911 TTY services over digital wireless systems for eighteen months, to April 1, 1999. In compliance with the E911 Report and Order, the industry has worked together to resolve these issues. As the Ex Parte Letter states:

Last week, CTIA convened a meeting of wireless industry representatives, technical experts and consumer organizations to obtain a consensus on how to support TTY/TDD technology over digital wireless systems. . . . Although solutions are being developed to address the interface issues of both the analog and digital networks, these solutions will not be available by October 1, 1997 [now November 30, 1997].⁷

U S WEST supports this extension. Neither U S WEST (with both digital PCS and cellular affiliates) nor its suppliers currently have the interface technology and solutions available to comply with the November 30, 1997, deadline.

U S WEST requests additional time for implementation of the best solution for TTY/TDD issues.

III. CONCLUSION

U S WEST urges the Commission to adopt an eighteen-month extension for the compliance date for implementation of 911 TTY/TDD services over digital wireless systems.

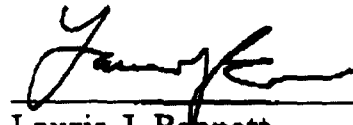
⁷ Ex Parte Letter at 4.

Furthermore, U S WEST urges the Commission to consider and adopt the other recommendations contained in the September 25, 1997, Ex Parte Letter.

Respectfully submitted,

U S WEST, INC.

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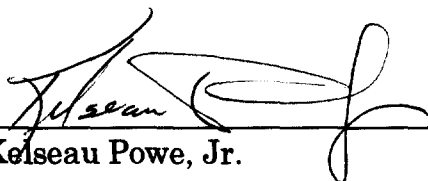
Its Attorney

Of Counsel,
Dan L. Poole

October 17, 1997

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 17th day of October, 1997,
I have caused a copy of the foregoing **U S WEST, INC. COMMENTS ON
EX PARTE FILING** to be served, via first class United States Mail, postage pre-
paid, upon the persons listed on the attached service list.


Kelseau Powe, Jr.

*Served via hand-delivery

(CC94102c.COS/LB/ss)

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